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FAA Pilot School Modernization

JOINT COMMENTS BRIDGE PERSPECTIVES OF AVIATION, COMMUNITY STAKEHOLDERS

In an unprecedented collaboration between national aviation organizations and community advocates, the University Aviation Association (UAA), the National Air Transportation Association (NATA), and the Aviation-Impacted Communities Alliance (AICA) jointly submitted a public comment to the FAA on Sept. 30 calling for the agency to integrate noise-sensitive operations awareness into pilot training standards.

This recommendation was one of seven proposals to strengthen the modernization of pilot schools under 14 CFR Part 141 offered to FAA in the joint comments submitted by the UAA, NATA, AICA. Their five-page letter is attached to the email that brought you this issue of ANR.

“The UAA, NATA, and AICA’s joint effort marks a significant milestone in bridging the perspectives of aviation and community stakeholders,” Darlene Yaplee, Co-Founder and President of the AICA, told ANR. “It demonstrates that shared values and mutual respect can bring these groups together around common goals. The progress reflected here points to new opportunities for continued cooperation rooted in common purpose and a focus on public benefit.”

Yaplee’s comments to ANR continue:

The joint filing builds on earlier comments from AICA, Save Our Skies Alliance, Groton Ayer Buzz, and the City of Phoenix Aviation Department, featured in the Feb. 14 issue of ANR [37 ANR 42]. A later March 28 report highlighted UAA and NATA’s endorsement of those community-focused recommendations. This latest submission, now co-signed by UAA, NATA, and AICA, formalizes that combined effort and advances a shared framework for modernizing pilot training.

Engagement among UAA, NATA, and AICA began after UAA and NATA reviewed AICA’s original comment and reached out to convey their alignment and endorsement with its positions. Subsequent discussions between the organizations led to the joint

filing, which synthesized seven shared recommendations and expanded on one through a specific proposal to integrate noise-sensitive operations awareness into the Airman Certification Standards.

Seven Recommendations for Modernizing

- 1. Optimize Training Efficiency:** Reduce regulatory and operational hurdles that unnecessarily impose inefficiencies in curriculum and resource allocation.
- 2. Integrate Scenario and Competency-Based Training:** Adopt FAA Industry Training Standards (FITS) practices into 14 CFR Part 141, including Learner-Centered Instruction (LCI), Scenario-Based Training (SBT), and Competency-Based Training and Assessment (CBTA).
- 3. Leverage Innovation and Technology:** Expand the use of Flight Simulation Training Devices (FSTDs) and adopt Virtual/Augmented Reality Training (V/ART).
- 4. Enhance Flight Training with Evidence-Based, Data-Driven Insights:** Incorporate safety and human-factors programs used in 14 CFR Parts 121 and 135 operations, such as SMS, FOQA, ASAP, LOFT, CRM, HFACS, and UPRT.
- 5. Increase Transparency of Program Effectiveness:** Require pilot schools to report student outcomes, training effectiveness, and operational safety metrics to the FAA to enable evaluation of trends and provide valuable information for students.
- 6. Incorporate Responsible Operations in Noise-Sensitive Areas:** Embed guidance from Advisory Circular (AC) 91-36D into pilot training to foster safe and community-conscious operations.
- 7. Incorporate Stakeholder Inclusion and Community Engagement:** Strengthen collaboration with impacted communities to foster mutual understanding and shared benefits in accordance with AC 91-36D.

Embedding AC 91-36D into Pilot Training

The joint comment recommends that the FAA include “responsible operations in noise-sensitive areas” in the Airman Certification Standards (FAA-S-ACS-6C), specifically within:

- PA.I.D.K2: Altitude selection accounting for terrain, obstacles, wind, and noise-sensitive areas.
- PA.V.B.K5: Maneuvering over noise-sensitive areas.

The proposal highlights Advisory Circular 91-36D, which encourages pilots flying under visual flight rules (VFR) to avoid noise-sensitive areas, if practical, or maintain at least 2,000 feet above ground level when over homes, schools, hospitals, parks, and wildlife refuges whenever safe. While the circular is voluntary, greater awareness among pilots and flight instructors could help reduce avoidable noise and strengthen community trust.

“Embedding AC 91-36D into training would raise awareness of voluntary noise-abatement practices and promote a community-conscious training environment,” the joint comment states. “It does not regulate noise-abatement procedures at airports, which are addressed separately under Part 150.”

Expanding Collaboration under FAA Modernization

The joint comment stated the National Flight Training Alliance’s role in bringing stakeholders together to advance modernization efforts that benefit the broader aviation community. It noted the establishment of several workgroups to support changes to Part 141, with UAA requesting to join the “Writing/Other” Working Group and AICA to serve on the “Operations” Working Group. According to the comment, the involvement of organizations would strengthen the coalition’s material and output.

Beyond the formal rulemaking process, UAA invited AICA to participate in its Collegiate Aviation Education Conference & Expo (Oct. 1–3, Costa Mesa, CA) on the panel “Greener Skies, Quieter Communities: Alternative Fuels and Cooperative Community Engagement.” Panelists included Curt Castagna (EAGLE Initiative), Chris D’Acosta (SWIFT Fuels), Jason Talley (Elemental Aviation), and Brianna Lehman (AICA).